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September 25, 2015

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VIA ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Fernandez et al. v. Restaurant Payserve of America, LLC et al.
Case No. 15 Civ. 05264

Dear Judge Torres:

Pursuant to Your Honor's Individual Practices Rule I.D, we write on behalf of Defendants Restaurant Payserve of America, LLC and Starr Restaurants Catering Group, LP, d/b/a Stephen Starr Events ("Defendants") to respectfully request that Defendants be granted until October 30, 2015 to answer the Complaint or submit a letter requesting a pre-motion conference. Since Defendants' previous extension request, the parties have engaged in extensive informal discovery in furtherance of their settlement discussions. Indeed, Defendants have produced hundreds of pages of documents and intend to produce thousands more as the parties continue to explore resolving this matter amicably. This additional extension will allow the parties to continue to fully focus their attention and resources on resolution.

This extension would bring Defendants' deadline for answering the Complaint or submitting a letter requesting a pre-motion conference from September 28, 2015 to October 30, 2015. This is Defendants' third request for such an extension. Plaintiffs' counsel has consented to this request and join Defendants in requesting that (i) the Initial Pretrial Conference, currently scheduled for October 26, 2015 at 4:45 p.m., and (ii) the deadline by which the parties are to submit a Joint Letter to the Court in advance of the Initial Pretrial Conference, currently set for October 22, 2015, be adjourned to dates convenient for the Court on or after November 6, 2015.

We thank the Court for its time and consideration.

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Respectfully submitted,

/s/ George B. Pauta

cc: D. Maimon Kirschenbaum, counsel for Plaintiffs (via ECF)